



600 14th Street NW Suite 750 Washington, D.C. 20005
W > <http://www.covad.com>

T > 202.220.0400
F > 202.220.0401

February 8, 2007

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 06-172: Verizon's Petitions for Forbearance Pursuant to 47 U.S.C. §160(c) in the Boston, New York, Philadelphia, Pittsburgh, Providence, and Virginia Beach Metropolitan Statistical Areas; RM-11358: Petitions for Rulemaking and Clarification Regarding the Commission's Rules Applicable to Retirement of Copper Loops and Copper Subloops; WT Docket No. 05-96: Rules for Wireless Broadband Services in the 3650-3700 MHz Band; ET Docket No. 04-151: Wireless Operations in the 3650-3700 MHz Band

Dear Ms. Dortch:

On February 7, 2007, Charlie Hoffman, Jim Kirkland, Chris McKee and I, all of Covad Communications, met with Commissioner Adelstein; Barry Ohlson, Commissioner Adelstein's Senior Legal Advisor; and Scott Bergmann, Commissioner Adelstein's Legal Advisor for Wireline Issues to discuss Covad's business generally and the above-referenced proceedings in a manner consistent with advocacy already included in the records of those proceedings. A copy of materials discussed in the meeting is attached.

Pursuant to Section 1.1206(b) of the Commission's rules, 47 C.F.R. § 1.1206(b), an electronic copy of this notice is being filed in each of the above-referenced proceedings.

Respectfully submitted,

Angela Simpson
Covad Communications Company
600 14th Street, N.W., Suite 750
Washington, D.C. 20005
202-220-0400
202-220-0401 (fax)



TRANSFORMING COMMUNICATIONS THROUGH BROADBAND INNOVATION

Covad Communications Group Inc.

February 2007

Ticker: DVW

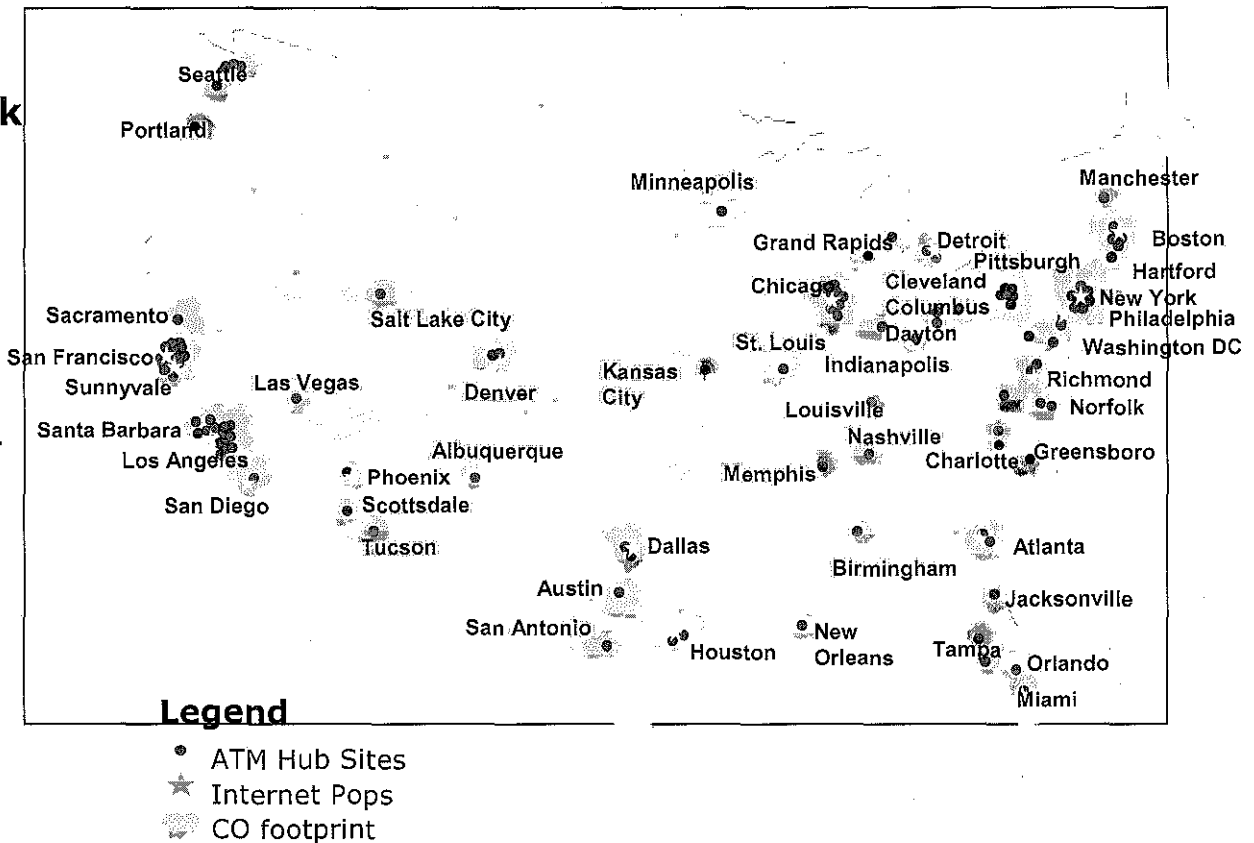
COVAD

Covad is a national, facilities-based provider of voice and broadband services

- **Founded in 1996, recently celebrated 10th anniversary, ~1,000 employees**
- **As a leading next-generation communications service provider, we are transforming communications through broadband innovation**
 - Largest national ADSL2+ network (allowing residential broadband speeds of up to 25 Mbps) with capabilities to deliver next generation broadband and voice services to over 14 million homes and businesses
 - Market leader with our direct Hosted VoIP (fully outsourced and managed) services to the Small to Mid-sized Business market
 - Leading fixed wireless broadband provider (speeds from 1-100 Mbps) for businesses, uniquely positioned to capitalize on the emergence of WiMAX
 - Wholesale partnerships enable innovative and competitive broadband and voice services to residential market – our customers include EarthLink, AT&T, and Verizon Business
- **Making an excellent customer experience our #1 priority**
 - 532,000 Access Lines
 - 2,500 VoIP Sites (47,000 users)
 - 3,100 Wireless Customers

Largest National, Facilities-based, Next-Generation Communications Service Provider

- **2,050 COs in 235 MSAs**
- **Next-generation network**
 - 758 COs in top 11 markets*
 - Capable of serving ~14M+ homes and businesses
 - LPVA, Bonded T1, ADSL 2+, MetroEthernet, Video, G.SHDSL capabilities
- **100+ wireless base stations passing 500k+ businesses**
 - SF Bay Area, Los Angeles, Las Vegas, Chicago



* Next generation markets include: Atlanta, Chicago, Dallas, Los Angeles, Miami, New York City, Philadelphia, San Diego, San Francisco/San Jose, Seattle, Washington, DC



Regulatory Stability Means Competition, Lower Prices, and Better Services for Consumers and Businesses

- **Competitive carriers have enjoyed nearly two years of regulatory stability** and have responded by investing billions of dollars in new facilities and services
- **Recent AT&T/BellSouth merger conditions ensure stable regulatory environment** through the end of the decade
 - Rate freeze for telco network elements used by competitive carriers until 2010
 - No forbearance petitions with the FCC during this time
 - In short, the largest incumbent phone company has agreed that no further tinkering with pro-competitive network access requirements is needed
- **FCC has already deregulated new broadband facilities of telcos**
 - Telcos now have full parity with cable company broadband services
- **Further fine tuning of telecom regulation will only bring back uncertainty, new waves of litigation and stalled investment**
- With deregulation of investment in new facilities, **the only remaining regulations are minimal, pro-competitive network access requirements that allow carriers like Covad to utilize legacy copper loops** that telcos built out many years ago
- **Covad connects these legacy loops to its state of the art network** to provide innovative new data, voice, and other services to businesses and consumers
 - Verizon Forbearance Petition would remove this important source of competition with no corresponding benefit



Covad Uses Legacy Copper to Provide Innovative New Services – Voice/VOIP/ADSL 2+ Bundle

